



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

HANNAH J. SAROKIN
phone: (212) 356-8761
fax: (212) 356-1148
email: hsarokin@law.nyc.gov

July 14, 2022

By ECF

Hon. Paul G. Gardephe
United States District Judge
United States District Court
40 Foley Square, Room 2204
New York, New York 10007

Re: *R.M. et al. v. New York City Department of Education*
21-CV-11210

Your Honor:

I am an Assistant Corporation Counsel assigned to represent Defendant in the above-captioned action. I write, jointly with counsel for Plaintiff and pursuant to the Court's Order dated June 13, 2022 (ECF No. 17), to provide an update regarding the status of this case and to respectfully request an adjournment of the Initial Pretrial Conference currently scheduled for July 29, 2022.

On June 9, 2022, the parties advised the Court that they were engaged in an informal exchange of information regarding Plaintiff's claims concerning Defendant's efforts to implement the underlying administrative orders in this case (ECF 14). Since that time, the parties have continued productive conversations and are optimistic that they will be able to reach a partial settlement in this case by July 21, 2022, which would leave only the matter of attorneys' fees to resolve.

In light of the parties' progress in resolving Plaintiff's implementation claims, Defendant has requested billing records from Plaintiff's counsel with the aim of obtaining settlement authority. Counsel for Plaintiff has advised that he can produce billing records within two business days of the anticipated resolution of Plaintiff's implementation claims, or by July 25, 2022.

The parties thus respectfully request that the Initial Pretrial Conference be adjourned *sine die* to allow the parties time to explore the possibility of full settlement of this

action without need for further Court intervention. The parties respectfully propose to submit a status update by September 12, 2022. In the alternative, the parties respectfully request that the Initial Pretrial Conference be adjourned 60 days, until September 27, 2022 or a date subsequent that is convenient to the Court.

Thank you for your consideration of this request.

Respectfully submitted,

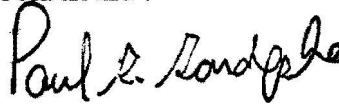
s/
Hannah J. Sarokin
Assistant Corporation Counsel

cc. Benjamin Kopp (by ECF)
Plaintiffs' counsel

Memo Endorsed: The conference currently scheduled for July 29, 2022 is adjourned to **September 8, 2022 at 12:00 p.m.** By July 21, 2022, and monthly thereafter, the parties shall submit a joint letter apprising the Court of the status of settlement negotiations.

Dated: July 15, 2022

SO ORDERED.



Paul G. Gardephe
United States District Judge